

Suspicious Orders

Title 21 CFR 1301.74(b)

Requires registrant to design & operate a system to disclose suspicious orders of controlled substances to the DEA

The requirement is to report suspicious orders, not suspicious sales after the fact.

Suspicious Orders

- Suspicious orders include:
 1. Unusual size
 2. Deviations from a normal pattern
 3. Unusual frequency
- Each controlled substance distributor must define their own parameters for a suspicious order.
- Suspicious order monitoring programs must evolve with the demands of fighting the constantly changing illicit drug market.

Suspicious Orders

The responsibility for making the decision to ship rests with the supplier.

Registrants who routinely report suspicious orders yet fill these orders, with reason to believe they are destined for the illicit market, are failing to maintain effective controls against diversion.

SAMHSA

2005 National Survey on Drug Use

6.4 million persons aged twelve and older admitted to using prescription drugs for non-medical reasons

- 4.7 million used narcotic pain relievers
- 1.8 million used tranquilizers
- 1.1 million used stimulants
- 272,000 used sedatives

SAMSHA

2005 National Survey on Drug Use

The illicit drug categories with the largest number of recent initiates:

1. Non-medical use of pain relievers
2. Marijuana
3. Non-medical use of tranquilizers
4. Inhalants
5. Cocaine

FURTHER INFORMATION

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